

EXHIBIT

P

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
---	--------------------------------------

This document relates to:

Burnett, et al. v. Islamic Republic of Iran, No. 15-cv-9903 (GBD)(SN)

Declaration of Anthony P. Newsome

I, Anthony P. Newsome, hereby declare under penalty of perjury as follows:

1. I am 34 years old and reside in Los Angeles, California.
2. I am the stepson of Johnnie Doctor, Jr. Who was killed on September 11, 2001 when terrorists crashed a plane into the Pentagon in Arlington, Virginia where he was stationed as an active duty U.S. Sailor.
3. At the time of his death on September 11, 2001, I had been residing with Johnnie for approximately nine years. My mother and Johnnie were married in approximately 1992 and I began living with him at that time and continued to do so until his death.
4. Throughout the time I lived with Johnnie, my biological father played no role whatsoever in my life. My biological father made no child support payments to my mother, and he never provided me with any direct financial support.
5. Sometimes I would become angry that my biological father would not come to see me and Johnnie told me not to be mad at my biological father because he was lost and trying to find himself.

6. Johnnie Doctor was the father figure in my life. He provided for me financially and emotionally. He nurtured me, guided me, encouraged me, disciplined me, and in all ways was my father. Johnnie Doctor taught me right from wrong and always encouraged me to be the best person I could be.

7. Throughout our time living together, I would see Johnnie every day. He would wake me up in the mornings for school and made sure I made my bed before I left the house.

8. Johnnie taught me how to drive a car.

9. Johnnie helped me open my first bank account and taught me the importance of saving for the future.

10. Johnnie helped me get my first job and taught me the importance of always showing up for work on time.

11. Johnnie attended parent-teacher conferences along with my mother and was involved with my school activities. He often helped me with my homework and always stressed the importance of getting an education.

12. Because he was in the military, Johnnie taught me the importance of respecting authority figures at all times. Johnnie was the authority figure in our home.

13. Johnnie referred to me as his son and treated me the same as his other children. I never felt any difference because he was not my biological father.

14. I was a big wrestling fan and Johnnie would take me to professional wrestling events

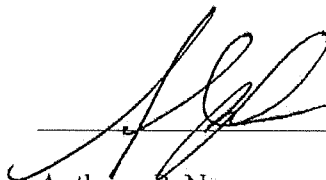
when they came to town. The night before his death on September 11, 2011, Johnnie took me to a World Wrestling Entertainment Event.

15. As I get older, I realize more and more the positive influence Johnnie Doctor, Jr. had been on my life.

16. Without Johnnie Doctor in my life, I would not be the man that I am today.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 8/6/2019



Anthony P. Newsome